The Connecticut Business and Industry Association (CBIA) appreciates this opportunity to comment on:

Raised Bill No. 5329, An Act Concerning the Use of Flame Retardant Chemical in Children’s Products and Upholstered Residential Furniture

CBIA oppose this bill

CBIA respectfully opposes this bill for the following reasons:

1. The approach outlined in HB 5329 is overly broad and not supported by the state of the science. This legislation would ban a broad range of flame retardants including substances that have been determined to be safe by regulatory authorities as well as new, innovative substances that haven’t even been developed yet.

2. Furniture is a major source of fires and HB 5329 would eliminate the availability of both current and future tools to help reduce furniture flammability.

3. HB 5329 would hurt innovation and limits product design options for the future that could be important for meeting key performance and safety standards. This bill would not only restrict a broad range of today’s flame retardant chemicals, but also flame retardants in the future, regardless of their safety profile and the assessments of government authorities.

4. The approval process for new chemicals globally is extremely rigorous, so it is unclear why Connecticut would want to prevent the development and use of new, innovative and sustainable products by Connecticut businesses.

5. HB 5329 would contradict existing and ongoing government regulatory reviews for some flame retardants including recent decisions under EPA’s new chemicals program as well as decisions by government authorities in Canada, the European Union and other countries. Thus, this bill would put Connecticut businesses at a disadvantage relative to businesses in other jurisdictions.

6. It would put Connecticut manufactures, retailers and wholesalers at a competitive disadvantage relative to imports and furniture producers/retailers/wholesalers from outside the state.

7. The legislation would include products for which these substances were not intentionally added but could be present at extremely low levels due to recycling or the use of recycled materials. This would undermine businesses and the state’s efforts to encouraging recycling.

Thank you for this opportunity to provide comment and for your consideration of our position.